Sunshine Coast Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests
Sunshine Coast Forest District
7077 Duncan Street
Powell River, BC
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This is a summary of the public input received on the Timber Supply Review in the Sunshine Coast Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Background

As part of the review of timber supply in the Sunshine Coast Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Sunshine Coast Timber Supply Area *Data Package* and *Information Report* in May 2000. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Sunshine Coast TSA. A 30-day review period, ending June 19, 2000, was provided for the public to comment on these documents.

On June 14, 2001, the British Columbia Forest Service released the *2001 Sunshine Coast Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended August 13, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the AAC for the Sunshine Coast TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Sunshine Coast Forest District office.

Public Review Process and Response

Sunshine Coast District staff actively solicited public input on the Timber Supply Review in the Sunshine Coast TSA through the following actions:

- approximately 84 copies of the *Data Package* (and *Information Report*) and 125 copies of the *Analysis Report* (and *Public Discussion Paper*) were mailed to various stakeholders including interest groups, local government, forest licensees, businesses and First Nations within and adjacent to the Sunshine Coast TSA.
- meetings or presentations were offered, and the district developed a response form for the *Analysis Report* that readers were encouraged to complete and return.
- the *Data Package* and *Analysis Report* were available at the district office in Powell River, the field office in Sechelt and the regional office in Vancouver. About 40 copies of the *Data Package* and 120 copies of the *Analysis Report* were picked up.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public.
- copies of all the documents were made available to the local media. Interviews were conducted with the local radio and newspaper.
- on June 1, 2000, a meeting was held in Sechelt with forest industry representatives. Ten people attended.
- on June 5, 2000, a meeting was held in Sechelt with representatives from local government and interest groups. Twelve people attended.

- in July and August, 2001, three open houses were held in Sechelt, Cortes Island and Powell River. Thirty-three people attended these events.

- referrals were made to the Ministry of Forests website where documents were available to download.

The Sunshine Coast Forest District received 19 written submissions on the *Data Package* and 36 submissions on the *Analysis Report* (see Appendix 1). As well, 740 form letters were submitted as public input on the *Data Package* and 218 form letters were received in response to the *Analysis Report*.

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Sunshine Coast TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Land Base Factors

The Sunshine Coast Forest Coalition (the Forest Coalition) expresses a desire to see no further reductions to the size of the timber harvesting land base (THLB). The coalition says no further land withdrawals are required to meet provincial mandates for other resource values, noting that although only four percent of the TSA is under protected status, over 20 percent of this is protected within the THLB. The Forest Coalition says this exceeds the 12 percent mandate and the surplus eight percent should either be rolled back into the THLB or be used to meet landscape level biodiversity objectives.

Sladey Timber Ltd. says land withdrawals should not occur until they are official, referring to protected areas on Mt. Elphinstone and aboriginal land claims. The Sunshine Coast Species Survival Network (the Species Survival Network) maintains it would be prudent to remove the traditional territory of the Sechelt First Nation from the THLB since it may be unavailable for harvest. The network says it is disrespectful for the Crown to plan harvesting on land included in treaty negotiations, as this land does not legally belong to the Crown.

Two forest industry submissions express concern that land base reductions may overlap and be double- or triple-counted. They ask for a review of this.

Two submissions question the addition of formerly inoperable or marginal areas to the THLB. The following points are made:

- high elevation areas have severe regeneration problems and affect watershed dynamics during snowmelt events.

- the assumption that previously-logged low sites may be logged again because they were logged once is spurious and unsupported.

- if problem forest types are included, they must be partitioned.

- formerly excluded deciduous types and alder-leading stands must remain partitioned to ensure proposed practices are undertaken and to track if regeneration to coniferous actually occurs.

- the use of minimum stumpage charges to subsidize the harvest of marginal sites, in order to meet five-year cut control requirements, is not an acceptable practice or economically viable.

The Cortes Ecoforestry Society and the Klahoose First Nation say the operable land base needs to be significantly reduced due to declining forestry employment, the need to diversify the TSA's economy, unresolved treaties and the fact that land base reductions do not provide for the

maintenance of adequate ecological composition, structure and functioning. Examples are provided. These submissions note that the 20 percent of the TSA suitable for harvesting is also the area needed for other values such as fish and wildlife habitat, cultural values and eco-tourism.

Roads, Trails & Landings

Several forest industry submissions say the *Data Package* fails to account for roads that are rehabilitated and reforested, and suggest these areas should be returned to the THLB. The submissions provide data on road rehabilitation to support their position. Other comments include:

- future allowances for road rights-of-way should be reduced because of increased heli-logging.
- if existing roads are netted out directly from the land base, any roads within riparian reserve zones or in other withdrawn areas will be double-counted.
- the assumption that roads are non-productive when netted out is not necessarily true. E.g., Coast Mountain Hardwoods opens old roads to harvest alder.

Forest Inventory

The Species Survival Network says the forest inventory is not accurate enough to set an AAC. They recommend that resources be provided to complete an accurate inventory and that a sensitivity analysis be done regarding the level of scientific uncertainty about the age class inventory.

Expected Rate of Growth

Three forest industry submissions maintain that growth rates are being substantially underestimated, based on vegetation inventory work and on the fact that logged volumes nearly always exceed cutting plan volumes The licensees provide data for a sample of cutblocks comparing cruise and scaled volumes, which show that productivity is underestimated. The Forest Coalition recommends a sensitivity analysis of this factor, while Interfor says the higher growth rates that have been confirmed should be included in the base case.

The Forest Coalition says that since improved seed has been proven to increase timber volumes and since it must be used when available, the potential to increase yields must also be recognized in the analysis. Licensees provide data on their use of improved seed. The Tuwanek Ratepayers Association say the long-term gains from improved planting stock is a "what-if" scenario, given the following:

- anticipated timber quality improvements may not occur, given long-term adaptation to a particular site.
- limited genetic variability may negatively affect the survival of forests, given climate change and pathogens.

Three submissions question the definition of the minimum harvestable age (MHA). They say the MHA does not maintain either timber volumes or value in the future, nor does it accommodate other forest uses and ecological functions.

Regeneration Delay

Two submissions say that using natural regeneration makes ecological and economic sense. They say short-term timber impacts from longer regeneration delays will be offset by cost savings from using natural regeneration and from restoration of long-term timber productivity.

The Forest Coalition provides licensee data to demonstrate that most licensees reforest within two years of harvesting and some achieve satisfactorily restocked status within 1.5 years. Interfor says they control about 50 percent of the AAC in the Sunshine Coast TSA and their records show an actual regeneration delay of 1.3 years.

Wildlife Management

The Roberts Creek Community Association says the Forest Practices Code's minimum standards for wildlife protection are now treated as maximum, and notes that portions of the Code that protect endangered species have never been enforced or fully implemented. The association says a complaint is currently before the Forest Practices Board regarding 150 blocks where critical habitat is being targeted.

A consultant refers to recent work that shows marbled murrelet populations continue to rapidly decline due to the destruction of breeding habitat in the remaining old growth forests. The consultant says the proposals for reserve areas are well below levels suggested by recent studies. The Tuwanek Ratepayers Association notes that federal policy requires area exclusions for the recovery of marbled murrelet populations.

The Tuwanek Ratepayers Association also says the exclusions for ungulate winter range do not address other wildlife habitat requirements or deer winter range needs, and even the reduction for critical goat range cannot be expected to be sufficient when the district has less than three percent protected area. Both goat and deer winter range should be mapped and specific areas excluded, according to the association.

The Species Survival Network's submission says they are pleased that new ungulate winter range maps are included and that critical goat winter range has been removed from the THLB. However, the network expresses concern that the *Data Package* contains no provisions for habitat needs for other wildlife and implies no current management for other species, which they say is not true. The *Data Package* should at the very least include maps of grizzly bear and marbled murrelet habitat, according to this submission.

Riparian Management

The Species Survival Network says the methodology used to calculate riparian areas has improved since the last Timber Supply Review (TSR1). However, the network suggests another approach (used in the Cranberry TSA), based on actual mapping and Code requirements rather than current practice as expressed by forest development plans.

Stand Level Biodiversity

Six submissions comment on the approach to stand level biodiversity in the *Data Package*. Their comments include:

- yield reductions are needed to reflect the designation of full cycle trees to provide a future source of large old trees, large snags and large deadfall, all of which are critical to stand level biodiversity.
- a minimum of 50 percent of natural levels of coarse woody debris is recommended by the *Biodiversity Guidebook*, a level that is unachievable under current utilization standards.
- the rationale for reducing Wildlife Tree Patches (WTPs) by 75 percent is absurd because much of the highest biodiversity areas and most important wildlife habitat are the same areas that are best for growing timber.
- reductions for WTPs must consider that in landscape units where extensive conversion to second growth has occurred, relatively more WTPs must be designated.
- scientific studies show that some critical wildlife species (e.g., pileated woodpeckers) require large ecologically intact areas to survive, and it's absurd to suggest that small WTPs or narrow riparian areas will ensure species survival.

Landscape Level Biodiversity

Two submissions question the use of the interim policy regarding low biodiversity emphasis option (BEO) areas and the two-thirds drawdown of old-growth requirements. The Sunshine Coast Conservation Association says this policy is not compatible with existing legislation, and policies that conflict with law cannot be accepted as current management. The Species Survival Network says if the interim policy is modelled,

the resulting AAC may preempt the possibility of full implementation of the guidelines when landscape unit plans are completed. Full implementation of biodiversity guidelines should be modelled, according to these submissions.

The Tuwanek Ratepayers Association expresses the opinion that Sunshine Coast communities will not likely accept low BEO and two-thirds drawdown for the Chapman landscape unit. The Sunshine Coast Regional District submission says that when landscape unit plans are completed, the biodiversity assumptions used in the timber supply analysis should be reviewed and the AAC adjusted.

A consultant says that if the level of remaining old growth has fallen below 10 percent of the original area in the TSA, then all harvesting must cease at the regional level. This submission suggests a goal of at least 12 percent of the land base, including productive forest areas, to be set aside to protect biodiversity.

Green-Up Requirements

Two submissions say a three-metre green-up height is insufficient to maintain adequate hydrological functioning. They say 15 to 20 metres is needed to provide the needle or leaf surface area and crown widths required for the interception of snow and rain, the protection of the forest floor and shading of snowpacks.

Watershed Management

The submission from the Sunshine Coast Regional District says they are opposed to logging in designated community watersheds or watershed reserves. A regional district director says decisions about activities in watersheds should be made by local governments, who are legally responsible for the quality and safety of the water flowing from them.

Two submissions say the Chapman-Gray Creek watershed should be removed from the THLB, citing the following reasons:

- a 1998 referendum made it clear residents do not approve of logging there.
- *de facto* protection is current management since the regional district took the Ministry of Forests to court in 1991 to stop logging due to the high frequency of landslides.
- current practice, indicated by Interfor's forest development plan, does not support its inclusion.

The Species Survival Network says all 26 of the designated community watersheds in the TSA should be removed from the THLB, as the costs of water filtration and/or increasing the distribution system are greater than any economic or social benefit to be gained from logging.

First Nations

The Species Survival Network says the information in the *Data Package* about archaeological/cultural sites is vague, and asks how it was developed and whether First Nations were consulted.

The Klahoose First Nation says they hold aboriginal title and rights throughout their territory, and they cite the Delgamuukw decision as confirming aboriginal title and rights and providing a framework for meaningful negotiations and consultation with First Nations. The Klahoose say co-management is a practical means of respecting their aboriginal title, and the Timber Supply Review could facilitate development of this by allocating a small portion of the operable land base to accommodate reasonable interim measures for Klahoose and other First Nations. The location of the lands to be protected would be decided by the Ministry of Forests and First Nations.

Socio-Economic Factors

The Forest Coalition says the forest industry is the major economic driver on the Sunshine Coast and even if tourism employment is higher, the annual income and taxation revenue from forestry is much greater.

The Forest Coalition also provides copies of 740 signed form letters, addressed to the Sunshine Coast Regional District, protesting the district's motion to stop all logging on the Sunshine Coast. The letters say that the forest industry is the major economic driver on the Coast and provides tax revenues that help run the regional district.

A consultant's submission says the *Data Package's* statement that forestry accounts for almost 30 percent of the total labour force implies this employment relies on wood from the TSA. The consultant says if wood from tree farm licences was excluded, a smaller employment level would result, noting also that most of the wood logged on the Sunshine Coast is not milled there.

The Sunshine Coast Conservation Association says the implications for the Crown's economic and social goals of not ensuring the protection of dependent, threatened and endangered species must be considered. The association says BC forest products have to meet increasingly stringent requirements to be accepted in the marketplace.

The Species Survival Network says the socio-economic analysis should:

- reflect that a lower harvest age will result in lower quality wood.
- include an estimate of the value of natural forest capital.
- include estimates of potential income from carbon trading credit programs, in which countries are paid to leave their forests standing.
- consider the value of using 10 percent post-consumer recycled pulp to allow a 10 percent reduction in the AAC.

A regional district director provides suggestions of additional types of data that must be integrated into the analysis. These include:

- for each local area, data on volumes of wood harvested, the value of them on the open market and royalties to the province.
- a comparison, area by area and licensee by licensee, between the free-market price and the values reported by licensees.
- ratios of estimated volumes of standing timber to volumes brought to the landing and to volumes arriving at mills.
- volumes and values of timber harvested from licensees' private lands.

An individual submission says victims of "downsizing" must be given access to alternate livelihoods (e.g., floral greens, medicinal herbs, beekeeping). This individual suggests balancing the annual take from a mushroom site against 80 to 100 years of waiting for the next timber harvest.

Timber Supply Area Analysis Report

Land Base Factors

The Forest Coalition, the Species Survival Network and an individual submission identify the need to define the Working Forest and avoid continual moving of the boundaries. The regional district submission says the part of Mt. Elphinstone recommended for park status should be removed from the THLB until issues of concern have been resolved.

A consultant says operability lines should be revised on the basis of future forest products and the ability to contribute to annual growth. The Sunshine Coast Conservation Association says subsidized heli-logging in inoperable areas highlights the fact that economically feasible, short-term timber supply is extremely limited in this TSA.

Two submissions point to an independent analysis of environmentally sensitive areas on Cortes Island that showed deficiencies in Ministry of Forests' estimates. The submissions say a revised analysis of bedrock terrain and

shallow soils is needed to define the operable land base and realistic growth rates.

Red Alder Types

Weyerhaeuser questions the assumption of a 40-year harvest of 95,000m^3 per year under the red alder forest licence. The company says a good proportion of alder-leading stands are already mature to overmature and won't be available for harvest much beyond the term of the present licence. They say operability in younger stands is more difficult, and their occurrence across the landscape is more limited than the current stands. The company requests mapping of the areas the *Analysis Report* assumes to be available, and expresses concern that the information in the report could be used to issue another hardwood licence that would compromise the viability of the current one.

Weyerhaeuser also says it's disconcerting they don't have full discretion to plant alder, and say the restriction on planting has already affected the long-term viability of the hardwood industry in this TSA. The company identifies many benefits of planting alder.

Forest Inventory

Four submissions comment on the status of the forest inventory. Their comments include:

- the degree of sampling uncertainty has been greatly reduced through use of the Vegetation Resources Inventory approach.
- an inventory is needed to account for the faster growth in second-growth stands. Any AAC increase attributed to this improved growth should only apply to those stands, to encourage licensees to intensify their silvicultural efforts.
- sufficient funding must be provided to complete forest inventory research.

Minimum Harvestable Age

The Sunshine Coast Conservation Association says reductions in MHAs since 1990 are another indication of uncertainty about short-term timber supply, as the reductions have produced the huge increase in "available" timber and an optimistic timber supply forecast. However, these reductions conflict with the maintenance of a balance of seral stages across the landscape, according to the association, which also notes that 95 percent of culmination age is meaningless in terms of ecological maturity.

Wildlife

Five submissions express concerns that provisions for wildlife habitat are insufficient. Specific concerns include the following:

- six years after implementation of the Forest Practices Code, the TSA still has no designated Wildlife Habitat Areas (WHAs) and only one completed landscape unit plan. Meantime, critical habitat is being fragmented.
- WHAs for grizzly bears have been mapped and should be removed from the THLB.
- the marbled murrelet has only 8.6 percent of its original habitat left. All suitable habitat that has been mapped needs to be netted out now, which will have a significant impact on the THLB since virtually none of the requirements can be met in the non-contributing forest. The marbled murrelet recovery team has called for setting aside of at least 10 percent of original old-growth forests; this TSA is in deficit.
- deer winter ranges and cover requirements to protect them must be accounted for in the analysis.
- no logging should occur in red- and blue-listed species habitats, or in potential Old Growth Management Areas.
- the assumption that wildlife will survive outside the THLB is flawed. Critical, low elevation habitat occurs extensively inside the THLB and is not well represented outside it.

- both the TSA and TFLs 43 and 39 do not have adequate mature forest cover constraints for wildlife, putting populations at risk throughout the forest district.
- Wildlife Tree Patches do not generally constitute suitable surrogates for WHAs because little if any high quality interior habitat is protected.
- the imperative to meet an inflated timber supply at the expense of wildlife habitat and biodiversity is the major forest policy conflict in BC, and this is epitomized in this TSA.

Biodiversity

Three submissions comment on how biodiversity provisions are accounted for in the analysis. These comments include:

- biodiversity should be increased before the AAC is.
- the assumption that the non-contributing land base and parks will adequately conserve biodiversity has no basis in ecology. Little of this area is low elevation.
- the two-thirds drawdown of old-growth requirements in low BEO units should not be considered because the area protected in parks is well below the provincial average of 12 percent and is not well dispersed.
- landscape unit planning as modeled is inadequate; timber supply policy simply overrides Code provisions for non-timber values. Examples are provided.
- the prediction in the analysis that old growth could contribute 500,000m^3 per year for the next three decades will require more land than the current 24,000 ha of old growth within the THLB (which provide one additional decade of harvesting at historical rates). This prediction also ignores old growth needed to meet minimal landscape unit planning requirements.
- after completion of landscape unit plans for the regional district portion of the TSA, the biodiversity guidelines used to set the AAC should be reviewed and the AAC adjusted if necessary.

Watersheds

Several submissions comment on the issue of community watersheds. Two submissions say all land within designated community watersheds and watershed reserves should be excluded from harvesting. The Regional District submission says water quality and quantity should be addressed as the first priority. As well, a regional district director says what the district wants is control of the watersheds upon which they rely. Two submissions criticize the inclusion of the Chapman/Gray Creek watershed in the THLB and the approval of logging there, saying these actions are provocative and confrontational, and designed to create "current practice" of logging in watersheds.

The Wilson Creek Watershed Coalition says the need for a Sensitive Habitat Inventory and a complete study of creeks in their watershed has not been considered in the analysis. The coalition wants a holistic approach to the entire watershed, including coordination of licensees, and asks when consultation with the group will occur.

Recreation Features

The Sunshine Coast Conservation Association notes the very small reduction to the THLB for recreation features, despite the 1990 *Options Report's* prediction of a significant increase in recreational usage and an inability to meet the expected demand.

Visual Quality

The Forest Coalition asks the Ministry of Forests to revisit Visual Quality Objectives (VQOs) because new harvesting techniques result in more volume available for harvesting.

Five submissions say the downgrading of VQOs in the TSA to allow maximum disturbance was accomplished in spite of broad local opposition by other economic sectors put at risk by this action. An individual notes that the forest industry did not keep their side of the bargain, continuing to downsize.

The Species Survival Network says VQOs should be restored to support the growing tourism and ecotourism industries, and to meet wildlife habitat needs. Two submissions note that many VQO zones are also coastal riparian zones and thus key habitats that need to be restored to a higher frequency of old-growth attributes over time.

The Regional District requests assurance that preservation of the visual integrity along popular travel corridors was considered in the analysis.

Socio-Economic Factors

The Forest Coalition says the analysis of employment associated with the forest industry is confusing and understated, noting that employment figures are incorrect and/or conflict with previous reports (i.e., *The Forest Industry in BC 1999*). An individual says that, unlike previous socio-economic analyses, this one shows the forest industry contributes about 30 percent of direct local employment, thus being a major contributor to the economic health of the community.

The Eco-care Conservancy of PR Region commented that the socio-economic analysis needed to account for other than just timber values. Examples were given, such as the value of botanical forest products and the value of the intact coastal forest. This submssion suggested the socio-economic analysis needed to be much more complex, and describe benefits and costs of different resource allocation decisions.

Nine submissions express concerns with various facets of the socio-economic analysis (SEA), including the following points:

- the need to protect all ancient forests for the survival of many small businesses that require wild places for their clientele must be considered.
- the economic consequences of boycotts of BC timber if wildlife habitat is not protected must be considered.
- the economic potential of the region derives as much from the natural amenities provided by intact natural habitat as it does from extractive industries.
- if the primary goal of harvesting is employment and income, other ways besides increasing the AAC and losing other forest values must be considered.
- much of the economic data is irrelevant. Sunshine Coast forests are fibre sources for industries on the Lower Mainland and Vancouver Island. Support for the local milling sector is largely limited to waste wood and problem types.
- the SEA is fundamentally inadequate as it does not considered the effect of harvesting on other economic sectors (tourism, the fishery), or the cost to all levels of government to remediate water quality.
- the SEA provides little for Sunshine Coast communities except some jobs in the harvesting, administration and silvicultural sectors; the cost (dedication of the entire productive forest land base exclusively for timber) is untenably high.

Other Comments

Most submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

Many submissions comment on the Timber Supply Review (TSR) process itself. Comments include:

- the analysis is conservative in every input (e.g., growth rates, improved seed, road widths) with significant impact to timber supply.
- assumptions used in the analysis were sound and defensible. The *Analysis Report* is comprehensive and objective.
- far too little time was provided for review of the *Data Package*.
- providing preferential access to the process to stakeholders or members of special interest groups undermines the objective of full public review.
- the process is flawed due to the constraint that "current management practices" will be modeled. There is overwhelming evidence that higher standards are needed (in practice and in the analysis model). Recommend modeling an ecosystem-based approach as well.
- disagree that the TSR is not a process for making land use or management decisions. It is based on maintaining industrial sustained yield forestry as the dominant land use.
- if the best information available were used, current management practices would be rejected and better ones modeled.
- the potential for naturally sustainable forestry and the benefits of forest diversity are excluded, allowing only those species pleasing to the market to exist.
- if the chief forester does not recognize the risks to wildlife resources inherent in the current TSR assumptions and current policy direction, he may bring the independence of his office into question.
- the analysis is not ground-truthed or spatially defined. The AAC should be linked to landscape unit plans and forest development plans.
- TSR documents are the product of a radical myopia, as a result of basic unresolved contradictions in policy, intent and vision. Forest management continues to redesign primary forests for the flow of a narrow range of commodities, treating other values simply as "constraints" to timber extraction. Making the shift to precautionary adaptive management is the primary task of a legitimate TSR.
- the underlying TSR question should change from "what is the maximum amount of timber we can extract?" to "what is the level of growing stock we need biologically to maintain forest structure and function, regulate hydrology and provide for critical wildlife habitat?"
- a supplementary analysis is needed that focuses on the protection of critical and adequate wildlife habitat and encourages the kind of harvesting that leaves the fabric of the forest intact. Also needed is an economic analysis that recognizes the contribution of non-timber values.
- the *Analysis Report* refers to the need to consider "broader community and social aspects" which the directors of the Sunshine Coast Regional District are uniquely qualified to address. Yet, their input has been ignored.

- TSR provides an excellent snapshot of the old-growth liquidation plan if carried to its conclusion but does not provide a good basis for determining timber supply if sustainable forests and forest communities are the goal.

Harvest Levels

Seven submissions express support for an eight percent increase in the AAC, mainly to provide economic stimulus to the local economy and because the proposed level is sound and rational. One of these submissions says their support is conditional on the wood being processed locally, or at least in BC. Three of these submissions say the analysis supports the work done by the forest industry in TSR1 and therefore the eight percent increase should be applied retroactively back to 1993.

In addition, 218 form letters express support for an increase in the AAC to 1.233 million cubic metres. These letters, received from students, business people, retirees, the general public and forest industry employees and contractors, offer the following reasons for their support:

- it will help fuel the economy and provide much-needed revenues to the impoverished local community.
- the downturn in the local forest industry has resulted in increasing taxes, while the local employment picture just keeps getting bleaker.
- an increase will provide the catalyst to make the forest industry welcome in the local community, despite local and regional governments doing little to help residents enjoy a standard of living that comes on the heels of a viable local economy.
- the analysis is built on hard empirical data, and supports a healthy economy and healthy environment, and meets the needs of the local community.

Seventeen submissions do not support an increase in the harvest level, or advocate for a decrease. Their reasons include:

- biodiversity and wildlife are not adequately protected in the current analysis model. The collapse of ecosystems is becoming measurable.
- potential land base reductions (First Nations land claims, community forest tenures) are not allowed for.
- the current depressed lumber market.
- expanding urban recreation pressures.
- importance of visual quality.
- it's unlikely the economic benefits will be realized, given increasing mechanization and job losses, free trade agreements (re: log exports), etc.
- an increase will limit the planning of where and how to harvest.
- the impacts of global warming are not considered.
- the inclusion of community watersheds in the harvesting land base.
- it's preferable to wait until landscape level planning is complete.

Appendix 1

Submissions received by the Sunshine Coast Forest District

Submissions received on the Data Package

First Nations
Klahoose First Nation

Local government
Sunshine Coast Regional District
John Marian, regional director, SCRD
Gambier Island Local Trust Committee

Forest industry
Sladey Timber Ltd.
International Forest Products Ltd.
Sunshine Coast Forest Coalition – four submissions
Coast Mountain Hardwoods Inc.

Consultants
Paul H. Jones, forestry consultant

Interest groups
Cortes Ecoforestry Society
Tuwanek Ratepayers Association
Sunshine Coast Species Survival Network
Roberts Creek Community Association
Sunshine Coast Conservation Association

General public
Two individual submissions
740 form letters

Submissions received on the Timber Supply Analysis Report

Forest industry
Sunshine Coast Forest Coalition
Weyerhaeuser Stillwater Timberlands
International Forest Products Ltd.
Sladey Timber Ltd.
IWA Canada, Local 2171
Interfor
FAB Logging Co. Ltd.

Consultants
Anik Consulting
Bill Lasuta & Associates

Local government
Sunshine Coast Regional District
John Marian, regional director, Area B

Interest groups
Sunshine Coast Species Survival Network
Sunshine Coast Conservation Association
Cortes Ecoforestry Society
Friends of Caren
BC Environmental Network
Wilson Creek Watershed Coalition
Eco-Care Conservancy of PR Region

General public
Eighteen individual submissions
218 form letters